

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

DUSTIN COMBS,

Defendant.

CASE NO.

JUDGE

INDICTMENT

18 U.S.C. §§ 2251(a) and (e)
18 U.S.C. § 2423(b)

FORFEITURE ALLEGATIONS

THE GRAND JURY CHARGES:

COUNT ONE

(Sexual Exploitation of a Minor)

1. On or about July 24, 2023, in the Southern District of Ohio, the defendant, **DUSTIN COMBS**, did employ, use, persuade, induce, entice, and coerce a minor, specifically Minor Victim, an approximately 13-year-old female, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing and attempting to produce any visual depiction of such conduct, to wit: one or more digital image or video files depicting Minor Victim engaged in the lascivious exhibition of the anus, genitals, and pubic area and sexual intercourse, the production of such visual depictions using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including the internet and a cellular phone that was manufactured in whole or in part outside of the state of Ohio.

In violation of 18 U.S.C. §§ 2251(a) and (e).

COUNT TWO

(Travel with Intent to Engage in Illicit Sexual Conduct with a Minor)

2. On or about July 24, 2023, in the Southern District of Ohio and elsewhere, the defendant, **DUSTIN COMBS**, did travel in interstate and foreign commerce, for the purpose of engaging in any illicit sexual conduct with another person, as defined in 18 U.S.C. § 2423(f), including the production of child pornography.

In violation of 18 U.S.C. § 2423(b).

COUNT THREE

(Sexual Exploitation of a Minor)

3. On or about October 8, 2023, in the Southern District of Ohio, the defendant, **DUSTIN COMBS**, did employ, use, persuade, induce, entice, and coerce a minor, specifically Minor Victim, an approximately 13-year-old female, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing and attempting to produce any visual depiction of such conduct, to wit: one or more digital image or video files depicting Minor Victim engaged in masturbation and sexual intercourse, the production of such visual depictions using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including the internet and a cellular phone that was manufactured in whole or in part outside of the state of Ohio.

In violation of 18 U.S.C. §§ 2251(a) and (e).

COUNT FOUR

(Travel with Intent to Engage in Illicit Sexual Conduct with a Minor)

4. On or about October 8, 2023, in the Southern District of Ohio and elsewhere, the defendant, **DUSTIN COMBS**, did travel in interstate and foreign commerce, for the purpose of engaging in any illicit sexual conduct with another person, as defined in 18 U.S.C. § 2423(f), including the production of child pornography.

In violation of 18 U.S.C. § 2423(b).

COUNT FIVE

(Sexual Exploitation of a Minor)

5. On or about October 21, 2023, in the Southern District of Ohio, the defendant, **DUSTIN COMBS**, did employ, use, persuade, induce, entice, and coerce a minor, specifically Minor Victim, an approximately 13-year-old female, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing and attempting to produce any visual depiction of such conduct, to wit: one or more digital image or video files depicting Minor Victim engaged in masturbation, sexual intercourse, and the lascivious exhibition of the anus, genitals, and pubic area, the production of such visual depictions using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including the internet and a cellular phone that was manufactured in whole or in part outside of the state of Ohio.

In violation of 18 U.S.C. §§ 2251(a) and (e).

COUNT SIX

(Travel with Intent to Engage in Illicit Sexual Conduct with a Minor)

6. On or about October 21, 2023, in the Southern District of Ohio and elsewhere, the defendant, **DUSTIN COMBS**, did travel in interstate and foreign commerce, for the purpose of engaging in any illicit sexual conduct with another person, as defined in 18 U.S.C. § 2423(f), including the production of child pornography.

In violation of 18 U.S.C. § 2423(b).

COUNT SEVEN

(Sexual Exploitation of a Minor)

7. On or about November 6, 2023, in the Southern District of Ohio, the defendant, **DUSTIN COMBS**, did employ, use, persuade, induce, entice, and coerce a minor, specifically Minor Victim, an approximately 13-year-old female, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing and attempting to produce any visual depiction of such conduct, to wit: one or more image or video files depicting Minor Victim engaged in the lascivious exhibition of the anus, genitals, and pubic area and sexual intercourse, the production of such visual depictions using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including the internet and a cellular phone that was manufactured in whole or in part outside of the state of Ohio.

In violation of 18 U.S.C. §§ 2251(a) and (e).

COUNT EIGHT

(Travel with Intent to Engage in Illicit Sexual Conduct with a Minor)

8. On or about November 6, 2023, in the Southern District of Ohio and elsewhere, the defendant, **DUSTIN COMBS**, did travel in interstate and foreign commerce, for the purpose of engaging in any illicit sexual conduct with another person, as defined in 18 U.S.C. § 2423(f), including the production of child pornography.

In violation of 18 U.S.C. § 2423(b).

COUNT NINE

(Sexual Exploitation of a Minor)

9. On or about April 19, 2024, in the Southern District of Ohio, the defendant, **DUSTIN COMBS**, did employ, use, persuade, induce, entice, and coerce a minor, specifically Minor Victim, an approximately 14-year-old female, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing and attempting to produce any visual depiction of such conduct, to wit: one or more digital image or video files depicting Minor

Victim engaged in the lascivious exhibition of the anus, genitals, or pubic area and sexual intercourse, the production of such visual depictions using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including the internet and a cellular phone that was manufactured in whole or in part outside of the state of Ohio.

In violation of 18 U.S.C. §§ 2251(a) and (e).

COUNT TEN

(Travel with Intent to Engage in Illicit Sexual Conduct with a Minor)

10. On or about April 19, 2024, in the Southern District of Ohio and elsewhere, the defendant, **DUSTIN COMBS**, did travel in interstate and foreign commerce, for the purpose of engaging in any illicit sexual conduct with another person, as defined in 18 U.S.C. § 2423(f), including the production of child pornography.

In violation of 18 U.S.C. § 2423(b).

FORFEITURE ALLEGATION A

11. Upon conviction of one or more of the offenses set forth in Counts One, Three, Five, Seven, and/or Nine of this Indictment, the defendant, **DUSTIN COMBS**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a): (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Title 18, United States Code, Chapter 110, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s); and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property, including but not limited to:

1. One Apple iPhone 12 Cellular Telephone;
2. One Dell Alienware black laptop, model number P109F; and
3. One Acer laptop, model number N16Q2.

Forfeiture in accordance with 18 U.S.C. §§ 2253(a)(1) and (3), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION B

12. Upon conviction of one or more of the offenses set forth in Counts Two, Four, Six, Eight, and/or Ten of this Indictment, the defendant, **DUSTIN COMBS**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2428(a): (1) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation(s); and (2) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation(s) including, but not limited to, the property listed in Forfeiture Allegation 1.

Forfeiture in accordance with 18 U.S.C. §§ 2428(a)(1) and (2), and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Foreperson

GRAND JURY FOREPERSON

**KENNETH L. PARKER
UNITED STATES ATTORNEY**



EMILY CZERNIEJEWSKI (IL 6308829)
Assistant United States Attorney